



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP/AS
F. #2021R00600

*271 Cadman Plaza East
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May 15, 2025

By Email and ECF

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Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were recently obtained by the government during the course of the investigation:

Bates No.	Description of Item
EDNY_134641-EDNY_134642	Draft translation of responsive chat from Linda Sun's iCloud
EDNY_134643-EDNY_134663	Final translations of responsive chats from Linda Sun's iCloud, produced in draft summary form as EDNY_134106-EDNY_134638
EDNY_134664-EDNY_134672	Responsive materials from a Silver MacBook Pro with Serial Number C02T89XXGTFL that was Seized at the Sun and Hu Residence
EDNY_134937-EDNY_135616	Records from the New York State Executive Chamber
EDNY_135617-EDNY_135625	Responsive chats from a Silver MacBook Pro with Serial Number C02T89XXGTFL that was Seized at the Sun and Hu Residence
EDNY_135626-EDNY_135741	Records from Flagstar Bank
EDNY_135742	Records from BNY Mellon
EDNY_135743-EDNY_135843	Records from Webster Bank
EDNY_135844-EDNY_136031	Records from TD Bank

Additionally, the following records were inadvertently produced twice, and are reproduced below for clarity:

Bates No.	Description of Item
EDNY_134673 - EDNY_134936	Records from the New York State Executive Chamber, previously produced as EDNY_050147 and EDNY_053147

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR.
United States Attorney
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By: /s/ Alexander A. Solomon
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